

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
ANASTASIA LUCIANO	:	VIOLATIONS:
	:	18 U.S.C. § 1344 (bank fraud - 1 count)
	:	18 U.S.C. § 2 (aiding & abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Citizens Bank was a financial institution conducting business in the Eastern District of Pennsylvania and elsewhere, the deposits of which were insured by the Federal Deposit Insurance Corporation.

2. From on or about July 14, 2005 to on or about July 25, 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

ANASTASIA LUCIANO

knowingly executed, and attempted to execute, a scheme to defraud Citizens Bank, and to obtain monies owned by and under the care, custody and control of Citizens Bank by means of materially false and fraudulent pretenses, representations and promises.

The Citizens Bank Fraud Scheme

It was part of the scheme that:

3. Defendant ANASTASIA LUCIANO met with persons known to the grand jury and was provided with account information for legitimate account holders at Citizens Bank for purposes of cashing counterfeit checks at Citizens Bank. Additionally, defendant ANASTASIA LUCIANO was provided with false Pennsylvania Driver's Licenses containing her picture and the identification information for the legitimate Citizens Bank account holders. Defendant LUCIANO was also provided with counterfeit checks that were endorsed in the name of the legitimate Citizens Bank account holders.

4. After being provided with the account information and false Pennsylvania Driver's Licenses, LUCIANO cashed the counterfeit checks at Citizens Bank by presenting the counterfeit check, account information and false Pennsylvania Driver's Licence to tellers at various Citizens Bank branches.

5. Between on or about July 14, 2005 and on or about July 25, 2005, defendant ANASTASIA LUCIANO assumed the identities of Citizens Bank account holders K.K., G.M. and T.S., and cashed and attempted to cash 6 counterfeit checks, totaling approximately \$22,700, as follows:

Date	Citizens Bank Location	Amount	True Account Holder
7/14/2005	Lansdale, PA	\$3,900.00	K.K.
7/14/2005	Montgomeryville, PA	\$3,600.00	K.K.
7/14/2005	Lansdale, PA	\$4,600.00	K.K.
7/16/2005	Lansdale, PA	\$4,100.00	K.K.
7/20/2005	Philadelphia, PA	\$4,200.00	G.M.
7/25/2005	Fairless Hills, PA	\$2,300.00	T.S.

All in violation of Title 18, United States Code, Sections 1344 and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY